

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

MINNEAPOLIS FIREFIGHTERS'
RELIEF ASSOCIATION,

Plaintiffs,

v.

MEDTRONIC, INC., *et al.*,

Defendants.

Civil No. 08-cv-6324 (PAM/AJB)

**JOINT MOTION PURSUANT TO
RULE 23(e) OF THE FED. R. CIV. P.
FOR PRELIMINARY APPROVAL OF
A CLASS SETTLEMENT**

The parties in this action hereby move the Court for an Order preliminarily approving the settlement of this matter and directing that notice be given and that a final hearing be scheduled to determine the fairness and adequacy of the proposed settlement.

In support of the Motion, the parties have filed the Stipulation of Settlement, proposed Notices, Proposed Orders and related documents.

The parties request that the Court, upon consideration of the proposed settlement, preliminarily approve settlement and direct that Notice be given and establish a hearing at which the Court will determine whether or not to finally approve the settlement pursuant to Fed. R. Civ. P. 23(e).

Dated: July 20, 2012

CHESTNUT CAMBRONNE PA

By /s/ Karl L. Cambronne

Karl L. Cambronne
Jeffrey D. Bores
Bryan E. Bleichner
17 Washington Avenue North
Suite 300
Minneapolis, MN 55401-2048
(612) 339-7300
Facsimile (612)336-2940

**BERNSTEIN LITOWITZ BERGER &
GROSSMANN LLP**

Max Berger
Salvatore J. Graziano
Adam Wierzbowski
Michael D. Blatchley
1285 Avenue of the Americas
New York, New York 10019
Telephone: (212) 554-1400
Facsimile: (212) 554-1444

GRANT & EISENHOFER P.A.

Geoffrey C. Jarvis
Jeff A. Almeida
1201 North Market Street, 21st Floor
Wilmington, DE 19801
Telephone: (302) 622-7000
Facsimile: (302) 622-7122

MOTLEY RICE LLC

Joseph F. Rice
James M. Hughes
28 Bridgeside Blvd.
Mount Pleasant, SC 29464
Telephone: (843) 216-9000
Facsimile: (843) 216-9450

*Lead Counsel for Lead Plaintiff
and the Class*

Dated: July 20, 2012

DORSEY & WHITNEY

By /s/ Peter W. Carter

Peter W. Carter
Suite 1500, 50 South Sixth Street
Minneapolis, MN 55402-1498
Telephone: (612) 340-2600
Facsimile: (612) 340-2868

KIRKLAND & ELLIS LLP

Emily Nicklin
655 Fifteenth Street, N.W.
300 North LaSalle
Chicago, IL 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200

Counsel for Defendants